

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

SECURITIES AND EXCHANGE)
COMMISSION,)
Plaintiff,)
vs.) Case No. 4:22-cv-3359
MAURICIO CHAVEZ,)
GIORGIO BENVENUTO, and)
CRYPTOFOX, LLC,)
Defendants.)
and)
CBT GROUP, LLC,)
Relief Defendant.)

ORAL VIDEOTAPED DEPOSITION
MR. ORLIN W. TURCIOS-CASTRO
December 8, 2022

Reported by:
Michelle Hartman
JOB No. 221208WWC

1 A. No. They only had one office in the
2 third floor.

3 Q. Okay. But there were other -- other
4 businesses operating in this building?

5 A. Yes, there are more businesses over
6 there.

7 Q. Did you know any of the 30 people who
8 were there other than Rossy Gomez?

9 A. No, just Tony that I had met about 18
10 years before, but we had lost a connection, contact,
11 and then I run into him in there.

12 Q. Okay. How did you meet Tony Lemus?

13 A. In sales.

14 Q. Did you work with Tony Lemus?

15 A. He applied for a position when I was
16 working for Lunchtime. He never got to work in
17 there, but we developed a relationship.

18 Q. After you met him during your time at
19 Lunchtime, how often would you see Tony Lemus?

20 A. We went out a couple of times for coffee,
21 and then I went over his house to do a presentation
22 of the product, and after that we lost communication.

23 Q. What product were you presenting at
24 Tony's house?

25 A. When I was selling them kitchen pans with

1 Lunchtime -- Lifetime.

2 Q. Lifetime is the company that Lunchtime
3 became?

4 A. No. Lifetime was the name of the
5 company. And then it changed to Imperial World
6 (sic) -- W-A-R-E.

7 Q. I don't have Lifetime or Imperial Ware on
8 my list of places you've worked. So can you fit that
9 in?

10 A. I started in 2010, because I worked in
11 Aqua Remach USA Corporation until 2009.

12 MS. AGUILAR: Can I have a minute?

13 THE WITNESS: And in 2010 I started with
14 Lifetime, like Lifetime, and then they changed their
15 name to Imperial World -- Ware.

16 MR. GULDE: You need a second, yeah, go
17 ahead.

18 THE VIDEOGRAPHER: The time is 10:28
19 a.m., and we are off the record.

20 (Discussion off record)

21 THE VIDEOGRAPHER: The time is 10:29
22 a.m., and we are on the record.

23 THE INTERPRETER: Per interpreter: For
24 the record, for all the times that we have mentioned
25 Lunchtime, the witness just clarified that he meant

1 Lifetime, L-I-F-E-T-I-M-E.

2 THE VIDEOGRAPHER: All right. Take a
3 break, right?

4 MR. GULDE: Yeah.

5 THE VIDEOGRAPHER: The time is 10:29
6 a.m., and we are off the record.

7 (Recess taken)

8 THE VIDEOGRAPHER: The time is 10:37
9 a.m., and we are on the record.

10 Q. (BY MR. GULDE) Mr. Turcios, we were
11 discussing the invitation that Rossy Gomez extended
12 to you to visit CFX at City Center.

13 Do you remember that?

14 A. Yes.

15 Q. When Tony Lemus took you aside, what did
16 you talk about?

17 A. He explained me about the project, about
18 what they were offering.

19 Q. And what was the project and what were
20 they offering?

21 A. He told me that it was an academy and
22 that we could become members of that academy and we
23 would have the benefit of 15 percent monthly of
24 interest.

25 Q. What kind of academy was he saying that

1 this was?

2 A. Crypto currency academy.

3 Q. Excuse me. And how did the academy side
4 of CFX work?

5 A. They explained me that they did the
6 trading in there, and from that trading, they would
7 give you the benefit of 15 percent, and that you can
8 also take classes with them.

9 Q. Okay. So who would conduct the trading
10 that happened to produce the 15 percent?

11 A. That was never explained to me.

12 Q. Did you ever ask?

13 A. Not really.

14 Q. Did you ever come to find out who did the
15 crypto currency trading for CFX?

16 A. No, because I -- due to time issues, I
17 never went.

18 Q. And when you say you "never went," you
19 never went to what?

20 A. To the trainings.

21 THE INTERPRETER: Per interpreter:
22 Interpreter needs to clarify something with the
23 witness.

24 (Witness and interpreter confer)

25 THE INTERPRETER: That's fine, we're

1 good.

2 Q. (BY MR. GULDE) Did you ever see crypto
3 currency being traded by CFX?

4 A. No.

5 Q. But do you believe that crypto currency
6 was traded on your behalf?

7 A. Yes.

8 Q. And was that the pitch to members
9 generally, that crypto currency would be traded on
10 their behalf to make this 15 percent monthly?

11 A. Yes.

12 Q. And that -- was that true whether or not
13 anyone ever actually went to classes?

14 A. Yes.

15 Q. And this was all explained to you by Tony
16 Lemus the very first day you heard about CFX?

17 A. Yes.

18 Q. Did Tony Lemus mention Mauricio Chavez to
19 you?

20 A. Yes, when I arrived there, yes, he
21 mentioned him.

22 Q. And what did he say about Mauricio
23 Chavez?

24 A. He told me he was the CEO.

25 Q. That he was the CEO of CFX?

1 A. Uh-huh, yes.

2 Q. And did Tony Lemus tell you anything else
3 about Mauricio Chavez?

4 A. No.

5 Q. Did you hear anyone from CFX talking to
6 the other 30 people who were there that night?

7 A. No, because they were doing it one to
8 one, so they took me to one place.

9 Q. You believe they spoke to each one of
10 these 30 people one on one?

11 A. I assume, because that's what they did
12 with me, I left there and I -- I left.

13 Q. Did you invest in CFX then or soon after?

14 A. Soon after.

15 Q. Okay. Can you estimate when and how
16 much?

17 A. Back then, it was like 20 days after, and
18 I invested \$4,000.

19 Q. And who did you give your \$4,000 to?

20 A. I went over there to the building.

21 Q. And this was the same building that you
22 had had this discussion with Tony Lemus in?

23 A. Yes.

24 Q. What time of day was it?

25 A. It was around noon.

1 Q. And then what time of day was that --
2 that first meeting that Rossy invited you to?

3 A. 11:00 in the morning.

4 Q. And was it a weekday or a weekend?

5 A. Weekday.

6 Q. How did you decide that you were going to
7 invest \$4,000 in CFX?

8 A. Because I was doing an investment with an
9 insurance company, which name is Prime America, and I
10 have with them my life insurance and retirement
11 insurance, so -- that I took out, 150 a month; and in
12 that year, 2020, which was the year of the pandemic,
13 I checked my account to see how much money I had then
14 and I realized that I had lost money with them, so I
15 decided to withdraw -- withdraw it and invest it in
16 here.

17 Q. And was that \$4,000 all of the money that
18 was in that account?

19 A. I opened some others later on. I brought
20 proof over there, but that was the first one I
21 opened.

22 Q. Okay. So you're saying you later opened
23 more accounts with CFX. But I'm asking if that
24 \$4,000 was all of the money that was in the
25 underperforming account that you removed?

1 A. Since they were investing in the stock
2 market, they should have had what I had initially
3 invested, that was around 10,000, but they only --
4 but it had gone down to about 4,500.

5 Q. Did you pull money out in cash?

6 A. They deposit it into my account and I
7 withdraw it in cash.

8 Q. And what bank was that?

9 A. Wells Fargo.

10 Q. Okay. How many accounts do you have at
11 Wells Fargo?

12 A. Just one.

13 Q. What other banks do you bank at?

14 A. At a credit union, which name is Energy
15 Capital.

16 Q. Energy Capital Credit Union?

17 A. Uh-huh.

18 Q. Other than Wells Fargo and Energy Capital
19 Credit Union, do you bank anywhere else?

20 A. No.

21 Q. Why didn't you just write CFX a check?

22 A. Because they told me it was with crypto
23 currency BitCoin, and if I didn't have BitCoin, then
24 I had to bring to cash.

25 Q. Who told you that you had to bring cash

1 if you didn't have BitCoin?

2 A. Tony.

3 Q. Okay. And did he explain why it needed
4 to be in cash or BitCoin?

5 A. He told me that they were going to buy
6 it.

7 Q. Tony Lee has told you that they were
8 going to buy BitCoin?

9 A. Yes.

10 Q. Okay. And what is your understanding
11 about why they needed cash to do that rather than a
12 check that you might write?

13 A. Honestly, I didn't ask him. Just because
14 of the same relationship and the fact that I knew
15 Tony, I didn't ask, I just trusted, I trusted.

16 Q. Well, what happened with that -- well,
17 let me ask this: Do you remember the terms of your
18 initial \$4,000 investment?

19 A. Yes.

20 Q. Okay. What is the returns that you
21 expected to get?

22 A. 15 percent a month payable every three
23 months.

24 Q. Okay. So when three months had passed,
25 what happened?

1 A. They paid me.

2 Q. And how much did they pay you?

3 A. 15 percent. I think it was \$1,800.

4 Q. And what happened to the original \$4,000?

5 A. I have that contract opened and every
6 three months they were paying me. I have had it open
7 for about a year and a half. Because that was the
8 time limit to have a contract opened, and then they
9 returned the main capital to me.

10 Q. I'm sorry if I'm going to make you repeat
11 yourself, but tell me how long the contract was open.

12 A. A year and a half.

13 Q. So for 18 months, you received an \$1,800
14 payment every three months?

15 A. In some cases through my own decision, I
16 did a rollover.

17 Q. And then at the end of the year and a
18 half, you pulled out the original seed, \$4,000?

19 A. I withdrew it, but since I have already
20 done some rollovers, I think I received \$7,000 plus.

21 Q. The 4,000, plus the amount that had been
22 rolled over?

23 A. Uh-huh.

24 Q. And all those payments of \$1,800, and
25 more as the case may be, did you believe them to be

1 the proceeds of crypto currency on your behalf?

2 A. Yes.

3 Q. Did you ever think that the money was --
4 that the \$1,800 payments were simply funds that had
5 been recently received from new investors?

6 A. No.

7 Q. Did you ever hear Tony Lemus disclose
8 that that might be happening?

9 A. No.

10 Q. Did you ever hear Mauricio Chavez tell
11 investors that that might be happening?

12 A. No. Because actually when I went into
13 this for one year and a half, the only thing that I
14 would go there for is to collect my money.

15 Q. Or to tell them to roll it over?

16 A. Yes.

17 Q. So a year and a half from October of 2020
18 gets us into -- is that April of 2021 -- '22? Sorry.

19 A. Yes.

20 Q. And then during the time that you had
21 this first contract opened, did you open any new
22 contracts?

23 A. No.

24 Q. During this time, did you take any
25 classes at CFX?

1 A. No, never.

2 Q. During this time, were you aware of CFX
3 operating in other cities?

4 A. No.

5 Q. Have you later become aware of CFX
6 operating in other cities?

7 A. Yes.

8 Q. How was it that you came to be aware of
9 CFX's operations in other cities?

10 A. When I would go to the office, I would
11 overhear people that were coming from other states.

12 Q. And this is when you would come to the
13 office after April 2022?

14 A. No, before. It was around January that I
15 started to realize, because I would bump into people
16 who would say, "Where are you coming from?"

17 "Oh, I'm from Illinois" and things like
18 that.

19 Q. Okay. So you would run into people in
20 Houston who had traveled from Illinois for what
21 purpose?

22 A. They would tell me that they were doing
23 the same thing I was, collecting their money.

24 Q. And did you see them collect money?

25 A. No, because that would be private. You

1 would get into a place.

2 Q. And was that your experience in
3 collecting money?

4 A. Yes.

5 Q. Okay. Would it be behind closed doors?

6 A. No. But it was, like, small -- a
7 small -- how did you call these things when you have
8 like the divisions for offices?

9 Q. I would call those "cubicles."

10 A. Uh-huh, exactly.

11 Q. And when you came to pick up your money
12 for payments, who would give you cash?

13 A. It was different. It was not always the
14 same person because there were different people
15 working there.

16 Q. And was it always a cash payment?

17 A. Yes.

18 Q. Did CFX ever write you a check?

19 A. No. No, at the beginning when I started,
20 I think they did two or three deposits to my account.

21 Q. And would this have been your Wells Fargo
22 account?

23 A. Yes.

24 Q. Okay. So you're talking about the \$1,800
25 payments, maybe two or three of them were deposited

1 to your account?

2 A. Yes.

3 Q. Who was it at CFX who would give you the
4 cash, do you know their names?

5 A. No, because it was just like young women
6 or young men that were working in there; and you
7 would arrive and there were people waiting, they
8 would give you your money, and you would leave.

9 Q. So you first described visiting a City
10 Center location for CFX. Did you ever start visiting
11 another location on Blalock?

12 A. Yes.

13 Q. About when was that?

14 A. In January, January of 2000 -- 2022.

15 Q. So before your initial contract had even
16 closed, they had moved to the Blalock location?

17 A. Yes, they were there.

18 Q. Was there anything different about coming
19 to get your money at the Blalock location than the
20 City Center location?

21 A. This place was bigger.

22 Q. Can you estimate how many people would --
23 how many investors would be at CFX when you would
24 come to pick up your check?

25 A. You would always see about 30 to 50

1 people.

2 Q. And is that true both at the City Center
3 location and the Blalock location?

4 A. No, here at Blalock.

5 Q. And were there more or fewer people at
6 the City Center location?

7 A. I would see less.

8 Q. But did you get the sense that CFX was
9 growing during the time you had your first contract
10 opened?

11 A. Yes.

12 Q. While you had your first contract opened,
13 did you attend any CFX recruitment events?

14 A. Yes, in January.

15 Q. Can you describe that?

16 A. Yes. Those happened on Mondays at 7:00
17 p.m., and you can go there, you can invite somebody
18 if you wanted, it was not a requirement; and then
19 somebody would go to the front and do the
20 presentation.

21 Q. Where were those held?

22 THE INTERPRETER: I'm sorry, the
23 interpreter needs the question to be repeated.

24 Q. (BY MR. GULDE) Where were those held?

25 A. In Blalock.

1 Q. And about how many people would attend?

2 A. It would change the amount of the times.
3 Sometimes I would go, sometimes I would see many; but
4 the place didn't have a huge capacity, maximum 60
5 people.

6 Q. And were these events designed to bring
7 people who were not current CFX investors into the
8 company?

9 A. It was for the new people that were
10 already in would learn how this worked and also for
11 the guests to learn about this, too.

12 Q. Were the guests generally people who were
13 already CFX investors or were they not?

14 A. No, usually the guests were -- would be
15 people that would come over to learn about it also.

16 Q. And about how many of these did you
17 personally attend?

18 A. I don't understand the question.

19 Q. You said that these were generally on
20 Mondays at 7:00 p.m. at the Blalock location. I'm
21 asking how often -- how many times total you went
22 there.

23 A. From mid January, I started going every
24 Monday. There were a few that because of reasons
25 related to my work I was not able to attend, but

1 generally I would go.

2 Q. And you said from mid January until when?

3 A. Like August.

4 Q. Why was it that you started attending
5 every Monday?

6 A. First, because I wanted to know this
7 well, to really know the product.

8 Q. And what did you come to find out about
9 the project during these Monday meetings?

10 A. That it was an academy with students and
11 they would do trading. You would become a member and
12 they would do the trading in crypto currency.

13 Q. In all of these meetings, did you ever
14 personally learn anything about trading crypto
15 currency?

16 A. No. No, they would promote classes for
17 people to go on other days, but I never attended.

18 Q. In all these Monday meetings, did you
19 ever learn anything about trading forex?

20 A. No, they did explain that they were
21 working with forex and crypto, but I didn't.

22 Q. Okay. So if we were to summarize what
23 you learned when you really wanted to know the
24 project, it was that CFX people said that they were a
25 crypto academy?

1 that part. Honestly, I have never asked.

2 Q. Does she have any kids?

3 A. Yes, she has two kids.

4 Q. And how old are her kids?

5 A. I don't know, but one is already an
6 adult, I think he's around 21 or 22, and the other
7 one is 14, 14 or 15.

8 Q. You're still friends?

9 A. Yes.

10 Q. How did Carmen De la Cruz get involved
11 with CFX?

12 A. When I saw that they were paying me, I
13 invited her to come and see the project.

14 Q. About when was that?

15 A. Like three months, around 2021.

16 Q. Okay. So you -- if you opened your
17 account in October 2020, three months passed, the
18 beginning of 2021?

19 A. Yes.

20 Q. And what did you invite her to?

21 A. Also, to come and see a project that I
22 was participating in and that I have already been
23 paid.

24 Q. Did you invite her to one of these Monday
25 meetings that you were going to weekly?

1 A. No, because I started in October 2020,
2 but I didn't start going to those meetings until
3 January of 2022, this year.

4 Q. Okay. Okay. So what specific event did
5 you invite Carmen to?

6 A. I told her to come and somebody in there
7 was going to explain her, just as they explained to
8 me.

9 Q. Okay. So you invited her to -- did you
10 come with her?

11 A. Yes.

12 Q. Did you sit in when they explained the
13 project to her?

14 A. Yes, yes.

15 Q. Who was it who explained it to Carmen?

16 A. Tony.

17 Q. And did Carmen invest as a result of this
18 meeting?

19 A. Yes, but not the same time, later on.

20 Q. Okay. How much later did Carmen invest?

21 A. It could have been one week later.

22 Q. Did you know how much she invested?

23 A. \$1,000.

24 Q. And do you know what Carmen's experience
25 has been with payout?

1 A. Yes, she was paid also.

2 Q. All right. We were talking about who all
3 went to the classes, and I asked if you knew anybody
4 who actually went to the classes, and you mentioned
5 Carmen. Who else went to the classes?

6 A. I know about people, but I don't know --
7 I do not know the names, but I know the people would
8 go because those classes were advertised. I do have
9 a friend that assisted -- that attended. I recall
10 now his name is Hans.

11 Q. Do you have a last name?

12 A. It is a bit complicated. No, I don't
13 have it.

14 Q. How did you know Hans?

15 A. He's my friend and he's a member of my
16 church. He's a captain in the United.

17 Q. An airline captain who flies for United?

18 A. Yes.

19 Q. Do you have Hans' number --

20 A. Yes.

21 Q. -- in your phone right now?

22 A. He's not a current member of the academy.

23 Q. Okay.

24 A. 763-245-1727. She attend -- he attended
25 classes, and as far as I understand, he learned how

1 to do the trading.

2 MS. AGUILAR: Can I have a moment,
3 please?

4 MR. GULDE: Sure.

5 THE VIDEOGRAPHER: The time is 11:23
6 a.m., and we are off the record.

7 (Discussion off record)

8 THE VIDEOGRAPHER: The time is 11:24
9 a.m., and we are on the record.

10 Q. (BY MR. GULDE) Now, you said a second
11 ago that Hans is someone who is not a member of the
12 academy anymore; is that right?

13 A. As far as I know, he's not.

14 Q. And by not being a member of the academy,
15 do you mean that his contract has expired and he has
16 gotten his money back?

17 A. Yes.

18 Q. Okay. Now, other -- other than Carmen
19 and Hans, who else do you know who took the classes?

20 A. I do know about the people, but I do not
21 know the names or the phone numbers because of so
22 many people.

23 Q. Can you estimate how many CFX investors
24 attend classes?

25 A. Honestly, no, because I never attended.

1 Q. Okay. We'll go over your contracts in
2 detail but -- when we have had a chance to look at
3 them, but can you -- can you tell us the next time,
4 if any, you invested with CFX after your original
5 contract closed?

6 A. Yes, the thing is there are things that I
7 forgot about, but I have them there.

8 Q. Should we just wait until we have them in
9 front of us?

10 A. Yes, they are there.

11 Q. Let's -- let's think about that first one
12 briefly, though. You talked about a year and a half
13 contract in which you were either paid \$1,800 every
14 six months -- every three months or you would roll
15 over some portion.

16 A. Okay.

17 Q. Is that -- is that true?

18 A. Yes.

19 Q. So that means that you were paid \$1,800
20 six times either in cash or to your account as
21 rollover, right?

22 A. Yes.

23 Q. And then on top of those payments, you
24 got your original \$4,000 back, right?

25 A. Yes.

1 Q. Okay. So 1,800 times six, I will
2 represent to you, is \$10,800. Do you agree with
3 that?

4 A. Yes, plus the capital.

5 Q. Plus the capital of --

6 A. No, with my capital.

7 Q. So if you -- if you got six payments of
8 \$1,800, times six, comes out to 10,800.

9 A. Oh, yes.

10 Q. And then you also got \$4,000 back, which
11 was your original investment, right?

12 A. Yes.

13 Q. So at the end of the day, that first
14 contract ended up putting 14 -- at least \$14,800 in
15 your pocket on your original investment of \$4,000?

16 A. Yes.

17 Q. And it may have been also more because of
18 rollover effects?

19 A. It could have been, yes.

20 Q. Okay. Now, are you -- we have heard from
21 many people that Aqua Remach is a place where they
22 would come to to do CFX business; is that true?

23 A. Yes, they would come.

24 Q. How did that come to be that the Aqua
25 Remach facility started to be used?

1 A. I invited -- three months after when I
2 was paid, I invited Ms. -- Mrs. Ivonne Madrid, who is
3 a person that knows me. We have a relationship. She
4 trusts me. And I told her that I was in a project
5 and that she could come and see, and she came to see
6 and she also decided to be part of the academy.

7 Q. Now, you said three months there, but I'm
8 not sure what the reference is. Three months from --
9 when was it that you invited Ivonne Madrid?

10 A. Three months from the date I started.

11 Q. Okay. So in the very beginning of 2021?

12 A. Yes.

13 Q. And what did you invite Ivonne to?

14 A. The day that I was coming to collect my
15 first quarterly payment, I told her to come with me
16 so she could see; and when she saw that I was being
17 paid, she asked for the information. The information
18 was provided to her, and she decided to join in.

19 Q. Was Tony Lemus there that day?

20 A. Yes.

21 Q. And was Tony the one she talked to?

22 A. Yes.

23 Q. Had you met Mauricio Chavez at this
24 point?

25 A. No.

1 Q. Okay. When did you ever meet Mauricio
2 Chavez?

3 A. It was really the year 2022.

4 Q. Did you know what month?

5 A. February, March.

6 Q. Okay. We will come back to that. Do you
7 know if Ivonne invested?

8 A. Yes.

9 Q. And do you know how much she invested and
10 when?

11 A. Since it was on the date that I came to
12 collect my money, it was January 2021, and she
13 invested \$10,000.

14 Q. Now, on this very day she invested
15 \$10,000?

16 A. Yes.

17 Q. Was it during that very visit?

18 A. Yes.

19 Q. Was it cash?

20 A. Yes.

21 Q. So Ivonne --

22 A. If I'm not mistaken, she didn't have all
23 the money with her, she had to come back later, but
24 it was that same day.

25 Q. Okay. Did she have any of the money with

1 her?

2 A. Yes, I think she had \$5,000 with her.

3 Q. Okay. So Ivonne came to CFX's office
4 that day expecting to be able to invest some money?

5 A. Yes. I didn't know she was going to do
6 it, but yes.

7 Q. And before she came and talked to Tony
8 Lemus, were you the only person she had talked to
9 about CFX and investing with CFX?

10 A. Yes.

11 Q. And did you tell Ivonne how CFX was able
12 to make 15 percent monthly on your investment?

13 A. Yes, I explained her what I knew, but
14 since she is somebody that needs to see to believe,
15 she came with me the day I was paid; and when she saw
16 that I was being paid, then she asked for somebody to
17 explain the project to her, and Tony explained to
18 her.

19 Q. And were you there when they explained
20 it?

21 A. Yes.

22 Q. And so how did Tony explain how they were
23 able to make 15 percent per month on your investment?

24 A. The same thing that they explained to me
25 and everybody else, that they were doing trading;

1 that they were -- there were classes also, but that
2 basically they were doing trading and that that was
3 the return.

4 Q. Did he show any records that reflected
5 the trades?

6 A. No.

7 Q. In this time, did you ever hear of CFX
8 not being able to make its payment?

9 A. No.

10 Q. And Ivonne never asked to see any
11 evidence of actual crypto currency trading?

12 A. Not that I know.

13 Q. So she opened a \$10,000 contract that
14 day; is that right?

15 A. Yes.

16 Q. Did you receive a referral payment for
17 bringing her in?

18 A. Yes, everybody would get a bonus referral
19 of seven percent.

20 Q. So did you get seven percent of \$10,000
21 on that day in January 2021 when Ivonne invested?

22 A. Yes, they would give it to you later on,
23 like two or three weeks after.

24 Q. Okay. How would that be recorded to you,
25 did you have to take any documentation in to show

1 that you were owed a seven percent referral for
2 Ivonne?

3 A. No. In the paper that you would sign,
4 the contract, it would be registered. And that I can
5 explain you in that one that you have over there.

6 Q. So you're pointing to a CFX contract that
7 I have sitting over here; is that right?

8 A. Yes.

9 Q. And we'll look at this in detail, but for
10 now, am I correct in saying that the only records
11 that you had that you were owed a seven percent
12 referral fee on Ivonne's contract was Ivonne's
13 contract itself?

14 A. The contract, yes.

15 Q. And did you get a copy of it as the
16 referrer?

17 A. No. The contract would have a yellow
18 copy and the original. In this case, that one
19 (indicates). And the original would go to Ivonne and
20 they would keep the yellow copy.

21 Q. CFX would keep the yellow copy?

22 A. Yes.

23 Q. Okay. So when these contracts were
24 signed, there were -- there is an original white
25 copy, and then underneath it with a carbon copy is a

1 yellow piece of paper with the same information?

2 A. Yes.

3 Q. And was there ever more than two pieces
4 of paper?

5 A. I never saw that.

6 Q. What would happen to your ability to
7 collect a referral fee if Ivonne lost her contract?

8 A. Honestly, I don't know. I don't have the
9 answer for that, but they always paid.

10 Q. Did you ever hear of that happening,
11 someone losing their contract?

12 A. No.

13 Q. Now, the seven percent was not the only
14 type of referral fee, correct?

15 A. They also had a two percent.

16 Q. And can you tell us how that worked?

17 A. For example, if I would invite you, they
18 would give me the seven percent. If I would invite
19 you and you would invite her, you would get the seven
20 percent and I would get the three percent, and that
21 would be it.

22 Q. Nobody gets -- or you wouldn't get
23 anything if -- if she signed somebody else up?

24 A. If she would invite somebody else, then
25 she would receive the seven, you would receive the

1 three, and I would stop receiving.

2 Q. Okay. How do you keep track of who --
3 who I'm referring?

4 A. For example, if I would invite you, you
5 would be aware of the people that have referred
6 because this was not another way.

7 Q. I'm not sure I understand your answer.

8 So let me ask this: How many people --
9 in the sum of your experience with CFX, how many
10 people did you refer?

11 A. Tops, eight to ten people.

12 Q. And you received seven percent for each
13 of those?

14 A. For the first referral.

15 Q. Okay. And then did any of those people
16 make referrals themselves?

17 A. Yes, a lot of the people that would get
18 to -- in the office of Aqua Remach, I didn't even
19 know them.

20 Q. But I'm asking you a more specific
21 question. The people that you referred personally,
22 you know that they also made referrals?

23 A. Yes.

24 Q. Okay. And so you were making the point
25 that a lot of them you haven't even met?

1 A. The ones that were referred by them.

2 Q. But you could still collect three percent
3 for each of their investments?

4 A. No. I'm going to explain why. No,
5 because I'm going to explain why. If I would invite
6 you and you would open a contract, then I would
7 receive the seven percent; but then if you would
8 decide to open a second contract, then I -- you would
9 receive that seven percent and I would only receive
10 three percent; and then if that person continued
11 inviting people, then he would get the two bonuses
12 because he had two contracts open.

13 Q. So for you to receive a three percent
14 bonus, your referrals would only have to be in for a
15 maximum of one contract?

16 A. Yes.

17 Q. That is more complicated than I had
18 realized. So how did you keep track of it?

19 A. You cannot have ever something exact or a
20 correct amount.

21 Q. Who was keeping track?

22 A. What I would say, if I would invite you,
23 I would say you are responsible of the people that
24 you invite, because I would not even know the people
25 that you are going to invite; and I would teach the

1 people to say the same thing with the people that
2 they would invite, "You are responsible for the
3 people that you invite."

4 Q. And by "you are responsible," do you mean
5 you're responsible for getting the information from
6 the people you invite about who they are inviting?

7 A. Yes, because I was not able to have
8 control of all of that.

9 Q. Was anyone at CFX keeping traffic of that
10 and making sure that people got their seven percent
11 and their three percent correctly?

12 A. Yes, because you would go to the office
13 to collect it.

14 Q. And would you see any records other than
15 the contracts that you've talked about that supports
16 whatever calculation that they were presenting as
17 correct?

18 A. No, I never saw a document. But I do
19 know that people would be paid at seven percent or
20 three percent.

21 Q. Did you also get a referral fee for
22 Carmen?

23 A. Yes.

24 Q. For Hans?

25 A. Yes.

1 Q. All right. So Carmen, Hans, Ivonne,
2 that's three right there.

3 Who else did you receive referrals from?

4 A. For my son.

5 Q. What is his name?

6 A. Junior.

7 Q. Does that mean his name is Orlin Turcios,
8 Jr. --

9 A. Uh-huh.

10 Q. -- or is his name just Junior?

11 THE INTERPRETER: Interpreter needs it
12 back.

13 (Witness and interpreter confer)

14 THE WITNESS: Orlin Wilfredo Turcios, Jr.
15 My full name complete but at the end Junior, J-R.

16 Q. (BY MR. GULDE) I think I had missed
17 Junior on the list of kids, but I think I asked it
18 wrong. You have two kids with your current wife,
19 right?

20 A. Yes. What happened is that you asked me
21 about the ones that were living with me, and those
22 are my stepchildren.

23 Q. What other kids do you have?

24 A. I have Orlin, Gerson Turcios --

25 Q. Spell, please.

1 A. It is G-E-R-S-O-N.

2 I have Mindy. Mindy, I have Sinia, and
3 Sandra, those are my kids.

4 Q. Okay. Let's go through the ages real
5 quick. Orlin?

6 A. Orlin is 33.

7 Q. Okay. Gerson?

8 A. 27.

9 Q. Mindy.

10 A. 30.

11 Q. Sinia?

12 A. 36.

13 Q. Sandra?

14 A. 38.

15 Q. Okay. Do they all live in Houston?

16 A. No, just Sinia.

17 Q. What does Sinia do?

18 A. Along with her husband, they own a small
19 remodeling company.

20 Q. What is it called?

21 A. I do not know honestly, but I can ask.

22 Q. What does Orlin do?

23 A. Orlin, he lives in Missouri. And as far
24 as I understand, he had a dealership of used cars.
25 He would buy cars in auctions and sell -- sell them;

1 and he was also buying houses in bad shape, refurb
2 them and sell them.

3 Q. Okay. And you signed him up to invest in
4 CFX?

5 A. Yes.

6 Q. Did you also sign up Sinia?

7 A. Yes.

8 Q. Did you receive a referral for Sinia?

9 A. Yes.

10 Q. What about Gerson, where does he live?

11 A. In Missouri also.

12 Q. What does he do?

13 A. He works for -- as a painter for the
14 union of laborers here in the United States.

15 Q. Okay.

16 A. In Kansas City.

17 Q. Did he invest in CFX?

18 A. No.

19 Q. Did you tell him about it?

20 A. No, because he's not a person that likes
21 businesses.

22 Q. How about Mindy, where does she live?

23 A. In Kansas City also.

24 Q. What does she do?

25 A. She works for WalMart.

1 Q. Okay. What does she do for WalMart?

2 A. As far as I know, she was a cashier.

3 Q. And did you invite her to invest in CFX?

4 A. No.

5 Q. Why not?

6 A. Because I know her situation and it is
7 more the case that I have to help her out.

8 Q. Did you invest for Mindy in CFX?

9 A. No.

10 Q. It was a pretty good opportunity. Why
11 didn't you do that?

12 A. I was about to do it because she didn't
13 have the possibility to do it herself, but then it's
14 when everything was closed.

15 Q. How about Sandra, where does she live?

16 A. Sandra lives in Nebraska.

17 Q. And what does she do?

18 A. I understand that she's working as a
19 nurse.

20 Q. And did she invest in CFX?

21 A. No.

22 Q. So we have talked about Carmen, Hans,
23 Ivonne, Junior, and Sinia.

24 Who else have you referred to CFX?

25 A. My daughter, Yakita. I invited another

1 lady whose name is Alma Miranda. I'm trying to
2 remember the names.

3 MS. AGUILAR: Give me a minute, please.

4 THE VIDEOGRAPHER: The time is 11:59
5 p.m., and we are off the record.

6 (Discussion off record)

7 THE VIDEOGRAPHER: The time is 12:00
8 p.m., and we are on the record.

9 Q. (BY MR. GULDE) Have you mentioned
10 Claudia?

11 A. Yes.

12 Q. Who is Claudia?

13 A. The wife of my son Orlin.

14 Q. Okay. So you signed Orlin up to his own
15 CFX contract?

16 A. Yes.

17 Q. And received a referral fee for that?

18 A. Yes.

19 Q. And you also signed up Claudia?

20 A. She registered under my son.

21 Q. Okay. So he is the -- he was her first
22 direct responsor?

23 A. Yes.

24 Q. Okay.

25 MR. GULDE: Okay. Let's go off the

1 record.

2 THE VIDEOGRAPHER: The time is 12:01
3 p.m., and we are off the record.

4 (Recess taken)

5 THE VIDEOGRAPHER: The time is 1:36 p.m.,
6 and we are on the record.

7 Q. (BY MR. GULDE) Mr. Turcios, we had been
8 talking about how CFX's business started to be
9 conducted out of the Aqua Rematch offices, and we
10 discussed Ivonne getting involved in CFX.

11 So would you continue telling us that,
12 and what happened after Ivonne started her first
13 contract with CFX.

14 (Phone buzzes)

15 MS. AGUILAR: Give me a moment, please.

16 THE VIDEOGRAPHER: Pardon?

17 MS. AGUILAR: Just give me a moment to
18 turn this phone off.

19 A. Yes, in January when I went to collect my
20 money of 2,022, over there I run into Tony Lemus and
21 Mr. Roberto Savala, and they told me that some of the
22 people that I have invited, have invited some other
23 people, and that there was a bonus that I was not
24 getting because I had not realized that this was
25 going on.

1 So I asked him, "Okay, then, what do I
2 have to do?" It had already gone since October of
3 2020 to January 2022, and they were paying me, so I
4 thought everything was fine.

5 So they came to my house and they
6 explained me what I have to do. So they explained
7 me, and I started to get in touch with the people
8 that I had invited. So that's when we started to go
9 on Mondays over there, and these people started
10 inviting some other people to come over here to these
11 meetings. Everybody was going over there to do their
12 contracts.

13 Q. (BY MR. GULDE) Let me hit timeout for a
14 second. You're saying "over there" and "here."

15 Are you talking about Mondays started --
16 Monday meetings started happening at the offices of
17 Aqua Rematch?

18 A. No, it was at Blalock. Right now I want
19 to do the link on how we end up in Aqua Rematch.

20 Q. Okay.

21 A. Uh-huh. And people were not only coming
22 on Mondays, but during the weekdays people were
23 coming over there to do their contracts; and the same
24 people would tell the person that had invited them,
25 "I went over there to have a contract done," and

1 that's how the person would find out that somebody
2 had entered into a contract and that he or she was
3 going to receive a bonus.

4 But it kept on growing and then we
5 started having problems in the parking spaces of
6 Blalock. So that's when we decided. I spoke with
7 Ivonne, I said, "Why don't we help people" -- I was
8 already there -- "help people get their contracts
9 done over there and so they wouldn't have to go to
10 the other place."

11 When I said that there was an extra
12 bonus, that they talked to me and they told me that
13 there was an extra bonus for me, it's a bonus that is
14 different from the seven and the three.

15 Q. Okay.

16 A. But that bonus was not only for me but
17 for everybody else, so we decided to do it there.
18 And everybody was very happy because they didn't have
19 to fix the issues that we were having with the
20 parking at Blalock, and that's how it started to be
21 done at Office Park.

22 Q. And when you say "Office Park," the Aqua
23 Remach office?

24 A. Yes.

25 Q. When was that?

1 A. Around March that it started.

2 Q. March of 2022?

3 A. Yes.

4 Q. And that's also around the time you met
5 Mauricio Chavez?

6 A. Yes.

7 Q. And describe how you met Mauricio.

8 A. At a meeting in there, he came over. The
9 first time I saw him was at a Monday meeting.

10 Q. At Blalock?

11 A. Yes.

12 Q. And did you speak to him?

13 A. No, I just said "hello" to him, because I
14 didn't know him.

15 Q. Did he play a role in the Monday meeting
16 that you attended?

17 A. No, he actually just stood up and said
18 "hello."

19 Q. And how was he introduced?

20 A. As the CEO.

21 Q. Did they introduce any other leadership
22 at CFX at this meeting?

23 A. No.

24 Q. Please explain how the -- this extra
25 bonus was going to be calculated.

1 A. To gain that bonus, you have to have at
2 least three direct people.

3 Q. And what does that mean, what does "three
4 direct people" mean?

5 A. Per directly by you, like if I would
6 bring you and you and her; and for those three direct
7 referrals to bring people, too, because they would
8 win the bonus, too.

9 Q. So was this extra bonus something that
10 was available to anyone involved in CFX who brought
11 three direct people and whose -- and whose referrals
12 also brought additional people?

13 A. Yes.

14 Q. And how is the bonus calculated?

15 A. Okay. If I would have three direct
16 referrals -- and they would call it "legs." If I
17 would have three legs and those three legs would make
18 a production of \$25,000 with their people, then I
19 would have -- I would get a bonus of \$500.

20 Q. Are you saying the three legs together
21 combined to make \$25,000?

22 A. Between the three, yes.

23 Q. Okay. So they make \$25,000 in your three
24 legs and you receive \$500 from that?

25 A. Yes, yes. But they would also be taught

1 that if they -- each of them would develop the three
2 legs and get that amount of money in, they would also
3 win the bonus.

4 MR. GULDE: I don't -- can you repeat
5 that?

6 THE COURT REPORTER: You want me to --

7 MR. GULDE: Yeah, just read it back.

8 (The record was read as requested)

9 Q. (BY MR. GULDE) I'm not sure what that
10 means, other than to say that if you developed three
11 legs of business, three direct people who you've
12 referred and collectively they have referred to
13 people, and altogether those three legs brings
14 \$25,000 in to CFX, then you are owed \$500.

15 Is there any other thing you're trying to
16 say about that?

17 (Discussion off record)

18 A. If you can give me a piece of paper, I
19 can draw you and show you how it works.

20 Q. Sure. I will mark it as an exhibit in a
21 bit.

22 A. (Complies). This is me and I have three
23 legs in here, and between them, they opened contracts
24 for \$25,000; between the three, I earned 500; but if
25 this one, who is my direct referral, also brings

1 three more legs, and they do the same, they also get
2 25,000, he makes the 500.

3 So what happens? I have the three, who
4 also did the same thing, so here 25,000, 25, 25,
5 that's 75. So they all qualified for a \$500 bonus.
6 But since they -- since they are direct referrals
7 from my referral, so now my production is no longer
8 25,000, it's 75,000, and now my bonus is 1,000. So
9 they -- all of them earned 500, but I earned 1,000.

10 Q. Is it different if you have six legs
11 under you, each of those \$25,000, you would get --
12 you would get \$2,000?

13 A. There was a chart that we all knew by
14 heart. For a production of 25,000, in this -- in
15 this way you would get 500. If the production was
16 50,000, then it was 1,000. Even if it was going to
17 be 75,000, it was within the same range of the
18 five -- of the 50,000 and it was \$1,000. If it was
19 100,000, the production with all the team, then it
20 was 2,500.

21 Q. Did this bonus structure incentivize you
22 to move production to Aqua Rematch?

23 A. It was not precisely that. Of course,
24 the money was of a benefit, but it was also helping
25 people and they would get money, and while they get

1 money -- they will win money, they will earn money,
2 then I would earn money.

3 Q. Can I call that group of legs a tree? Is
4 that your investment tree?

5 A. Yes.

6 Q. Okay. So can you tell us that -- at your
7 largest point, how big was your tree?

8 A. I never had an exact control already,
9 because since there is no system, then you can lose
10 track of it. For example -- and this is an example,
11 I'm going to use a fictitious name -- this is Maria,
12 and Maria had three legs. So I would ask her,
13 "Maria, how much did your group make?" But Maria had
14 three legs, and for Maria to learn that information,
15 she had to ask her legs, too.

16 So that was the system just to have
17 control, and it kept growing and it kept growing
18 because everybody else started to bring. And there
19 were people that would earn bonus of 500, 1,000,
20 2,500. And a lot of these people, there were people
21 that would get also eligible to get the bonus, the
22 seven and the three.

23 Q. Right.

24 A. And at the end of the month, they would
25 receive this other bonus. This was once a month.

1 Q. Understanding that it's inexact, what is
2 the biggest bonus that you ever got?

3 A. The biggest bonus that I have got, last
4 one was 14,000.

5 Q. Okay.

6 A. But by then there were people that earned
7 bonuses that were 1,000, 2,500, 5,000.

8 Q. Through the entire time that this bonus
9 structure existed -- well, when did they start this
10 bonus structure for you, was it March of 2022?

11 A. February 2022.

12 Q. Okay. So --

13 A. With the small bonuses, I started
14 growing.

15 Q. So from that time in February 2022 until
16 September of 2021, how much total do you think you
17 got in this separate bonus structure?

18 A. About \$60,000.

19 Q. Is that \$60,000 the only money you made
20 in connection with CFX during that time?

21 A. And my contract.

22 Q. And how many more contracts do you have?

23 A. I think it was three or four. I think I
24 brought -- brought them now.

25 Q. Are they in that big stack or are they

1 separate?

2 A. The one in a folder, those are separate.

3 MR. GULDE: Okay. Would you --

4 THE WITNESS: No, those --

5 MR. GULDE: These are copies?

6 THE WITNESS: No, no, the folder. That
7 folder. No, this one.

8 MS. THEMELI: This one?

9 MS. GALUAN: (Speaks in Spanish).

10 THE INTERPRETER: Those are copies.

11 THE WITNESS: Okay. They should be
12 there.

13 MS. AGUILAR: Eso.

14 THE WITNESS: And this one from my wife,
15 these are mine. It is three -- four in total.

16 Q. (BY MR. GULDE) I'm going to -- I'm going
17 to mark the packet I just handed to everybody as
18 Exhibit 15.

19 (Exhibit 15 marked)

20 Q. (BY MR. GULDE) And I will hand that to
21 you. So you have just told us that this
22 represents -- Exhibit 15 represents four of your
23 contracts with CFX, plus a contract of your wife?

24 A. Three, plus one of my wife.

25 Q. So let's just walk through these as they

1 appear in this stack. The first page is a contract
2 under your name with a start date of February 3rd,
3 2022 in the amount of 40,000; is that right?

4 A. That's my son, Junior.

5 Q. Okay. Okay. I missed Junior at the end.

6 And you are your son's indirect sponsor;
7 is that right?

8 A. Yes.

9 Q. And who is Gladis Romero?

10 A. It is a friend of mine, a member of my
11 church who I invited. So even though I invited my
12 son to this, I gave my son to her so she could
13 complete a bonus that she was looking to earn.

14 Q. Under the three-leg system that you just
15 discussed?

16 A. Yes.

17 Q. Okay. And it appears that your son was
18 paid on May 3rd and August 3rd, 2020, a total amount
19 of \$36,000; is that right?

20 A. Yes.

21 Q. And does this document show that he got
22 his \$40,000 paid back to him, too?

23 A. No.

24 Q. Okay. Where would that be reflected?

25 A. It would have to appear here in this area

1 (indicates). Again, the date, it would have to
2 mention the 40,000, and it would have to say
3 "capital."

4 Q. So does this document mean that he's
5 still -- as of August 3rd, 2022, still had \$40,000 at
6 CryptoFX?

7 A. Yes. Because even though the contract is
8 for six months, if the people -- the person would
9 decide to do so, you could extend it for another six
10 months.

11 Q. But is there any indication on here that
12 he decided to extend this for six months?

13 A. Automatically in here, if -- he would
14 have to say if he wanted to withdraw his money, and
15 when he would have said so, then he would have to
16 wait 30 days in order to collect the capital; and if
17 not, it would be renewed automatically, or you can
18 mark in here, (indicates).

19 Q. Okay. Thank you. Let's turn to the next
20 page. This is a contract and in the name of Sandra
21 and Mario Turcios; is that right?

22 A. Yes.

23 Q. Sandra is your daughter, right?

24 A. No. She's my sister-in-law. Mario
25 Turcios is my brother.

1 Q. Okay. And the two of them invested
2 \$5,000; is that right?

3 A. Yes.

4 Q. And this was on September 8th, 2022.

5 Now, what does this say down here on
6 month five?

7 A. No, it was a note that it was added here.
8 He had the date to collect his first payment on
9 September the 8th, and then on the December the 8th,
10 which was the second, he was already saying that he
11 was going to cancel.

12 Q. Does this -- does this document reflect
13 the repayment of whatever he had remaining on his
14 contract?

15 A. Just the first payment. He just
16 collected 2,250.

17 Q. Okay. So he is still owed by CFX
18 according to this document?

19 A. Yes.

20 Q. And is he owed the difference between
21 5,000 and 2,250?

22 A. According to the contract, he was
23 supposed to collect 2,250 in December, and then wait
24 for 30 days to collect his capital of 5,000.

25 Q. Because it was only a three-month

1 contract; is that right?

2 A. Six months here. Here is the date,
3 "start date," (indicates).

4 Q. Well, September 11th is already three
5 months after the start date, correct?

6 A. Yes.

7 Q. Was he going to get another 2,250?

8 A. It was his turn after the September the
9 8th, it was December the 8th, other payment due.

10 Q. I guess I don't understand that, because
11 it is marked as a three-month contract.

12 A. Okay. The contract was done for six
13 months.

14 Q. It says three months in the box.

15 A. Yes, I'm going to explain you that.

16 Q. Okay.

17 A. And it was going to expire on December
18 the 8th. So since he -- since it was paid every
19 three months, he -- he was supposed to get two
20 payments. From June 8th to September 8th, three
21 months, he collected 2,250; and the following month,
22 he was due another payment on 12 -- on December the
23 8th, three months after this date.

24 Q. But he had decided to cancel?

25 A. Many people before that day arrived and

1 they would notify that they were going to cancel, so
2 they would know. Because you could not cancel before
3 the six months. You could not receive your capital
4 before six months.

5 Q. Okay. So it would have the effect of
6 just giving -- giving CFX notice if they did not
7 intend to renew their contract?

8 A. Yes.

9 Q. Okay. And the next page is a contract
10 with Sandra Arteaga Barahona and Allan J. Turcios.

11 A. Yes.

12 Q. Who are they to you?

13 A. Sandra Arteaga is the same as Sandra
14 Turcios. The only difference is here he (sic) used
15 the last name of my brother and here he (sic) used
16 his maiden last name. And Allan Turcios is my
17 nephew, so their son.

18 Q. And the next page is a contract with
19 Claudia Turcios and then Orlin W. Turcios Artiaga.

20 A. Claudia Turcios is the wife of my son,
21 Orlin W. Turcios. Here he put Artiaga because
22 Artiaga is his mother's last name.

23 Q. Okay. But this is Junior?

24 A. Junior.

25 Q. Okay. And so far we haven't seen one

1 that had -- had you on the name, right?

2 A. On my name?

3 Q. Yeah, none of these contracts have been
4 for you personally, right?

5 A. No, they are coming.

6 Q. Okay. The next page is one for Claudia,
7 we have talked about her.

8 The next page after that is Yakira. Is
9 this your daughter?

10 A. But these are two different contracts.

11 Q. Right, I skipped Claudia.

12 A. Okay.

13 Q. And Yakira is your daughter?

14 A. Yes.

15 Q. Okay. And then the direct and indirect
16 sponsor are both you?

17 A. Yes.

18 Q. Okay. And then the next page -- well,
19 actually, on the back of this page you see a
20 handwritten note that says "September 29th, '22,
21 10:00 a.m." Do you see that?

22 A. Uh-huh.

23 Q. Do you have any idea what that is?

24 A. No. Somebody put a note in there, but
25 no.

1 Q. Okay. And now the next page is Orlin
2 Turcios and it says "# 3."

3 A. That's me.

4 Q. And this is -- this is you. Why does it
5 say "# 3"?

6 A. Because I had -- I had the first -- hold
7 a second. Let's see. One, two -- I had three
8 contracts. Where somebody would have more than one
9 contract, you would write down number one, number
10 two, number three.

11 MS. AGUILAR: Excuse me, we are looking
12 at number three?

13 MR. GULDE: Number three right now.

14 Q. (BY MR. GULDE) Okay. So this was a
15 contract that had a start date of June 24th, '22; is
16 that right?

17 A. Yes.

18 Q. And did this \$15,000 come out of your own
19 pocket?

20 A. Yes.

21 Q. Did you invest in cash?

22 A. Yes.

23 Q. Who did you give your money to?

24 THE INTERPRETER: Interpreter is going to
25 repeat the question, because I think it was

1 A. No. It was somebody that was in the
2 academy, but he didn't want to tell me.

3 Q. Does Orlin, Jr. know who beat him up?

4 A. He knows.

5 Q. Did you make a police report about that?

6 A. I don't know if he did, because he
7 also -- well, Orlin is young. And he was eating at a
8 restaurant and apparently this person came to attack
9 him and apparently he responded to it.

10 Q. Did you file a police report as to any of
11 the threats you received?

12 A. No, I was trying to understand that
13 people, what they were going through. But I
14 published a post in one of the chats saying that for
15 any people that would keep threatening me, I was
16 going to report them.

17 Q. And was there any response to that chat?

18 A. Once in a while somebody calls me now,
19 but it is not as much, but my life has changed
20 because I cannot go to public places.

21 Q. Any time after September 20th, did
22 Mauricio reach out to you to tell you about the
23 lawsuit?

24 A. Yes. But I didn't learn through him, I
25 learned through the social media.

1 Q. So never before October 4th did Mauricio
2 reach out to you?

3 A. No.

4 Q. And then when did you first speak with
5 Mauricio about the lawsuit?

6 A. When -- after the 4th, when it appeared,
7 I even sent him a photo and asked him what was going
8 on.

9 Q. And what did he tell you?

10 A. Yes, that it was a civil lawsuit but it
11 was going to be resolved.

12 Q. Did he tell you anything about the asset
13 freeze?

14 A. No, but I already -- I had already read
15 about it.

16 Q. Did you discuss the asset freeze with him
17 that day?

18 A. No, not that day. I just asked him in a
19 general way, because I already knew about the
20 lawsuit, and I have already taken the decision not to
21 continue.

22 Q. Did you discuss with Mauricio the
23 appointment of a receiver when you spoke with him?

24 A. No.

25 Q. Have you spoken with Mauricio since that

1 first conversation about the lawsuit?

2 A. Yes, I had a few short calls with him.
3 Because I would call to explain to him what was going
4 on with me, what was happening to me.

5 Q. You're talking about the threats?

6 A. Uh-huh.

7 Q. Is there anything you discussed with
8 Mauricio since October 4th other than the threats
9 that you can recall?

10 A. No.

11 Q. How about whether or not CFX would
12 continue?

13 A. Not really, because for me it was once
14 there was a legal issue, I don't want to deal with
15 it.

16 Q. Are you aware of the efforts of people to
17 continue the business of CFX?

18 A. No, because for me, my world was the
19 people that I was there with -- with, and we decided
20 not to continue and I didn't knew anything else.

21 Q. All right. And you haven't heard from
22 any of those people that there are efforts to
23 continue the work of CFX?

24 A. No.

25 Q. Let's turn back to Exhibit 15. We had

1 been looking at Orlin Turcios Number 3, and turn to
2 the next page, and now we're looking at Orlin
3 Turcios/Siria "Munguia" --

4 A. Munguia.

5 Q. -- "Munguia" Number 3. And this reflects
6 that a payment of 6,750 was made to the two of you on
7 September 30th, '22; is that right?

8 A. Yes.

9 Q. And this would have been made in cash by
10 you to yourself, basically?

11 A. No, because they had to authorize it.

12 Q. Who is "they"?

13 A. The office.

14 Q. Okay. And who are the people in the
15 office, is it Carmen De la Cruz?

16 THE INTERPRETER: I'm sorry, interpreter
17 needs the question to be repeated.

18 MR. GULDE: Sure.

19 Q. (BY MR. GULDE) Naming those people by
20 name, are we talking about Carmen de la Cruz?

21 A. No. Carmen was a person that I brought
22 there.

23 Q. So she wouldn't authorize a payment to
24 you?

25 A. No.

1 Q. Who are the people who would authorize a
2 payment to you?

3 A. Well, there was a lady that worked over
4 there at the office who was the accountant, and that
5 was Ms. Norma.

6 Q. Do you know the lady who was the
7 accountant? Do you know her name?

8 THE INTERPRETER: Per interpreter: The
9 witness said, "Ms. Norma."

10 MR. GULDE: Oh, I'm sorry, I thought we
11 were talking about two people.

12 THE INTERPRETER: (Shakes head.)

13 MR. GULDE: Okay. My apologies.

14 Q. (BY MR. GULDE) Do you know Norma's last
15 name?

16 A. No.

17 Q. Ms. Norma would have authorized this
18 payment to you?

19 A. Yes, they would authorize it.

20 Q. And then turning to the next page, we
21 have a contract with your name and Siria's name on
22 the top.

23 A. Yes.

24 Q. And it reflects a payment -- multiple
25 payments but the latest payment being 3,375 to you on

1 September 30th, '22?

2 A. Yes. My turn was on September the 15th,
3 but I was not able to collect it up until September
4 the 30th. That's when it was authorized.

5 Q. Okay. And the cash came from cash on
6 hand at Aqua Rematch?

7 A. No. When I would go, I would go not only
8 to deliver, I would go and deliver it and then they
9 would say, "This is what is going to be paid, this is
10 authorized to be paid," and then they gave me that
11 money.

12 Q. Just to make sure I understand, on any
13 given day when you needed to make payments from the
14 Aqua Rematch location, are you saying that you would
15 bring the contracts that required these payments to
16 the main office at Blalock, show them, and pick up
17 the according amount of cash?

18 A. Yes, people would give me copies. And
19 then I would bring the copies there. They were
20 authorized to see which those were, they would give
21 me the money, and then people would come over to the
22 office.

23 Q. Did you understand that on
24 September 30th, the receiver was in control of the
25 Blalock office?

1 A. Now I do.

2 Q. And so how did -- how did you get to --
3 on September 30th, this was a Friday?

4 A. Because I have gone on Thursday to the
5 office. Thursday, 28th? Let me check.

6 Q. Please check. And Thursday was the 29th.

7 A. I have been -- I have gone on the 28th.

8 Q. Your calendar reflects that you went to
9 the Blalock office on the 28th?

10 A. No, I'm just looking at what is the day
11 that I went. Because I remember that day because
12 those were the last days that I was working with
13 there with them. Uh-huh, yes, it was the 28th.

14 Q. So as to this \$3,300 and any other amount
15 that needed to be paid on the 30th, how did you store
16 that cash?

17 A. I would leave that money over there in
18 the office.

19 Q. Did you have a safe?

20 A. Yes, I had a small safe that I had
21 bought.

22 Q. Did you ever use paid security at Aqua
23 Rematch?

24 THE INTERPRETER: Interpreter needs to
25 clarify. The question is paid security?

1 MR. GULDE: Guards.

2 THE INTERPRETER: Okay.

3 A. No.

4 Q. (BY MR. GULDE) Even after the threats
5 began?

6 A. The threats started after the 4th, the
7 day 4th, which I didn't open anymore.

8 MR. GULDE: Okay. I think we have hit a
9 good stopping point to go move our cars.

10 THE VIDEOGRAPHER: The time is 3:00 p.m.,
11 and we are off the record.

12 (Recess taken)

13 (Exhibit 16 marked)

14 THE VIDEOGRAPHER: The time is 3:23 p.m.,
15 and we are on the record.

16 Q. (BY MR. GULDE) Mr. Turcios, I put an
17 exhibit sticker, Exhibit 16, on the handwritten
18 document that you made to describe the legs of the
19 extra bonus structure; is that right?

20 A. Yes.

21 Q. Would you take that, your pen, and just
22 print your name and then sign your name below it.

23 A. Yes. (Complies).

24 Q. Thank you. Now just set it over here.

25 A. (Complies).

1 Q. And that's your signature as you normally
2 sign it on the bottom of Exhibit 16?

3 A. Yes.

4 (Exhibit 17 marked)

5 Q. (BY MR. GULDE) Now I'm handing you a set
6 of documents that's been labeled Exhibit 17.

7 MS. AGUILAR: Can I take a picture of
8 this?

9 MR. GULDE: Huh?

10 MS. AGUILAR: Can I get a picture of it?

11 MR. GULDE: Yes.

12 Q. (BY MR. GULDE) Can you identify the
13 documents that I have labeled Exhibit 17?

14 A. Yes.

15 Q. And I don't mind that you've taken the
16 staple off -- or the paperclip off, but would you
17 take care to keep them in order.

18 A. Okay.

19 Q. Are you able to identify this? Do you
20 know what this is?

21 A. Oh, yes.

22 Q. Okay. What is it?

23 A. This is something that I did personally
24 when it was my time to pay a referral bonus, so I
25 could have evidence that I have paid the person.

1 Q. Was it your idea to keep these receipts?

2 A. Yes.

3 Q. Are you aware of anyone else at CFX who
4 kept these receipts?

5 A. No, I do not know really because this was
6 something that I did personally.

7 Q. And this is part of a spiral bound --
8 well, it is the entire contents of a spiral bound
9 receipt notebook that you brought here today; is that
10 correct?

11 A. No, I have one more.

12 Q. You have another notebook like this?

13 A. Yes, I can give it to her.

14 Q. You didn't bring it today?

15 A. No. No, I thought that maybe one would
16 be enough.

17 Q. Okay. Definitely give it to your lawyer,
18 and we have already requested all documents that are
19 related in any way to CFX, so we view this as
20 responsive to that request.

21 A. That's fine.

22 (Information to be supplied)

23 Q. (BY MR. GULDE) So this particular
24 notebook runs from February 21st, 2022 through
25 May 31st, 2022; is that right?

1 A. Yes.

2 Q. So those three months between February
3 and May, can we assume that your -- the other
4 notebook that you have covers three months as well?

5 A. I am not sure, because I think I have
6 two -- I don't want to give dates, so I would rather
7 just give it to you.

8 Q. Do any of these -- well, let's walk
9 through this. Let's just look at the first receipt
10 in the notebook. And that's from February 21st,
11 2022. I think you might be looking at the wrong page
12 because you flipped a couple over.

13 A. No.

14 Q. Oh, okay, my mistake. The very first one
15 is from CFX in the amount of \$7,000, correct?

16 A. Yes.

17 Q. And does your name in the "From" space
18 indicate that you authorized the payment of \$7,000?

19 A. No. What it says, that I paid that
20 amount; and if you can see here on the top, it says
21 "CFX," and then I would ask for the name of the
22 person and the signatures, but I wanted to keep some
23 evidence that had -- that I had issued that payment.

24 Q. Who authorized the issue of this \$7,000
25 payment?

1 A. Since they do the contracts over there,
2 this person was due for his -- his referral bonus.
3 So the company would give me the money, and I wanted
4 to have a receipt because I had to match my numbers
5 with them, I have to present to them proof.

6 Q. So other than giving you the money to pay
7 Mr. Hernandez in this case, did they give you a piece
8 of paper to indicate that he was owed a referral
9 bonus?

10 A. No. Because in the contract, the person
11 would do -- for example, in here, when you would see
12 here, you would already know who would take the first
13 bonus and who would take the second bonus.

14 Q. So, for the record, you're pointing to
15 one of the contracts within Exhibit 15 that lists the
16 direct and indirect sponsors, right?

17 A. Yes, those were the people that were
18 going to earn the money.

19 Q. Whose job was it to make sure that they
20 kept track of all of those direct and indirect
21 sponsors in those lines on all of the CFX contracts?

22 A. The person, the person that would bring
23 the referred individual would have to say, "This is
24 what I am owed."

25 Q. Okay. So in the case of this \$7,000

1 payment in Exhibit 17, this would be Dorian
2 Hernandez's job to know that he is owed \$7,000 in
3 this case?

4 A. Yes.

5 Q. And as the person who's going to hand him
6 that cash and give this receipt, would you review the
7 contracts to make sure he had done his math right?

8 A. I would have to get a copy of the
9 contract. I would have to take it to the office.
10 They would also check it, and then they would
11 authorize it.

12 Q. Okay. So if we're talking again about
13 this one, Dorian Hernandez would have come in to Aqua
14 Rematch sometime before February 21st, 2022 and tell
15 you that he expected a bonus payment of \$7,000; is
16 that right?

17 A. Yes.

18 Q. And then you would -- he would come with
19 his contract. Would you make a copy of that contract
20 at that time?

21 A. Yes, and I take it to the office.

22 Q. Okay. Now, this writing on the side that
23 gives the contract number, does that indicate that
24 this is what he is owed as a bonus in connection with
25 a single contract?

1 A. Yes.

2 Q. And then what does "bono doble" mean?

3 A. Okay. There were sometimes that the
4 academy would make promotions for a week or a few
5 days, for example, to say, "From this date to this
6 date, we are going to give a double bonus."

7 Q. So is there any way to know from this
8 document here in Exhibit 17 whether this represents a
9 direct or an indirect bonus?

10 A. This is a direct bonus, because the only
11 double bonus was the direct.

12 Q. Okay. So does that mean that \$7,000
13 represents 14 percent of Contract Number 16014?

14 A. Yes.

15 Q. Okay. So that makes this contract a
16 \$50,000 contract?

17 A. Yes.

18 Q. So is it your testimony that every single
19 receipt in here is only related to the payment of
20 bonus payments?

21 A. Let me check. Because sometimes when
22 they told me that I needed to pay the earnings, the
23 return for a person, that's when they need the
24 receipt. And they should be here. Let me check.

25 Okay. Okay. If you pass eight pages --

1 Q. Can you give me the receipt number?

2 A. It is not clear in here. It is 1962 --

3 Q. Uh-huh.

4 A. -- 233.

5 Q. Got it.

6 A. Here it says -- in some of them it says
7 "referral bonus" and in some others it says "contract
8 payment." This is one for 450 that was paid for this
9 person. The second one in that page is the same, it
10 is a contract payment, 2,250; and then there is
11 another one, \$7,200. There are some that are
12 payments for contracts.

13 Q. Why didn't you have receipts for all the
14 payments on contracts that you have made?

15 A. Because I did this when the person would
16 come to the office -- to the office to collect the
17 money and they would not have their original with
18 them. If they would have the original, then we would
19 do this; and if not, I would issue them a receipt.

20 Q. Okay. So you're indicating on
21 Exhibit 15, for the record, the packet of contracts
22 that if an investor had his contract, you would note
23 on the relevant month line how much money was being
24 paid pursuant to the contract; is that right?

25 A. Yes.

1 Q. And is that if someone came to Aqua
2 Rematch and did not have their contract, then that
3 would result in the creation of a receipt that's
4 reflected in Exhibit 17?

5 A. Yes.

6 Q. I thought you had testified earlier -- go
7 ahead.

8 A. Sorry. But I did that just because I
9 wanted to have an evidences that everything was
10 clean.

11 Q. That you weren't taking the money for
12 yourself?

13 A. Yes.

14 Q. I thought you had testified earlier,
15 maybe I misunderstood, that you were not aware of
16 situations in which people had lost their contract?

17 A. Yes.

18 Q. Okay. Does this reflect your -- does
19 this refresh your recollection about whether or not
20 that happened?

21 A. No. What happened is that when they
22 would come to the office, it is not that the
23 individual had lost their contract. Sometimes they
24 would come from their office, from work, and they
25 didn't have the contract with them at the time, and I

1 would attempt to issue a receipt so you don't have to
2 come back.

3 Q. I guess I'm still confused. There are
4 situations where you would hand them a receipt but
5 not hand them money?

6 A. No, no, I did. I mean, if the person
7 would not bring that (indicates) original contract,
8 then I would -- what I would do was protect myself
9 showing that I have given them the money by doing a
10 receipt.

11 Q. And did you ever end up seeing the
12 contract that they had left at work or whatever?

13 A. What happens is that for them, many times
14 it was easier for them just to take a photo of the
15 contract and bring it like that. That's why I would
16 know the contract number.

17 Q. Would you ever create a receipt like this
18 and pay out money without at least a picture of the
19 contract?

20 A. Yes.

21 Q. Explain that.

22 A. They would -- I mean, they would show me
23 the photo, and when I would take that to the office
24 and I would show this to them and they would see --

25 Q. To the Blalock office?

1 A. -- the contract number, they would find
2 it.

3 Yes.

4 Q. But the money had already been paid out
5 at that point?

6 A. Yes. At the moment they would sign it
7 here, it was because I was handing them the money.

8 Q. And just to be clear, did anyone ever
9 come in without even a picture of their contract and
10 get cash from you as reflected in one of these
11 receipts?

12 A. No, I would not pay them.

13 Q. Was there ever a situation where you took
14 one of these receipts and showed the Blalock people?

15 A. Yes, when I would go over there to match
16 our numbers, I would say, "This is the amount of
17 money you gave me and here are the receipts," and
18 they would see.

19 Q. It is something you did regularly?

20 A. Yes.

21 Q. Was there ever a time when you had to
22 claw money back because they disagreed?

23 A. No. Because we always know every time
24 you would make a contract, you will have the date and
25 the amount that they were going to collect.

1 Q. And that was a record that they
2 maintained at Blalock as well?

3 A. Yes.

4 Q. Okay. So just to make sure I have it
5 correct, the reason there are not many payments of
6 contract payments in here is because usually people
7 have their contracts with them and it has already
8 been cleared with Blalock?

9 A. Yes.

10 (Exhibit 18 marked)

11 Q. (BY MR. GULDE) Handing you what I've
12 marked Exhibit 18.

13 A. Okay, something that I want to clarify:
14 I do not know if the other people would work like
15 that, this was my own work -- my own way to work.

16 Q. And so when you're talking about "other
17 people," who are you talking about?

18 A. I am talking about somebody else that
19 would have a different group, I don't know how they
20 would work.

21 Q. Well, you know how they did things at
22 Blalock, right?

23 A. Yes, yes.

24 Q. Okay. And did -- they did not do
25 receipts like this for bonus payments, did they?

1 A. If the person would go over there to
2 collect their money, as far as I understand, they
3 would have to sign something.

4 Q. They would be signing something on the
5 contract that reflects they're owed a certain amount?

6 A. When I went to collect the money from my
7 first contract, I would -- I had to bring my original
8 contract. There was no other way. You had to bring
9 the original. They would put the amount, you would
10 sign it. And some other times I was to sign
11 electronically.

12 Q. And then when we're talking about other
13 groups that might have their own way of doing things,
14 who are those other groups?

15 A. I'm talking generally. Because in the
16 case -- if it's the case that you're going to
17 interview something that was doing the same thing
18 that I was doing, this was not something standard.
19 This is something that I was doing to make sure that
20 I was doing it right.

21 Q. I'm just asking you what other groups are
22 you aware of?

23 A. Well, no, I mean, I have my group. I
24 imagine that there were other people that had groups.

25 Q. Are you aware of an operation in Chicago?

1 A. I have heard about it, but I -- it is not
2 something that I have seen with my own eyes. I have
3 never been to Chicago.

4 Q. You have never visited Chicago yourself?

5 A. No, I have never been there.

6 Q. Have you visited Louisiana?

7 A. Yes.

8 Q. Did you visit the CFX operation in
9 Louisiana?

10 A. Yes.

11 Q. And when was this?

12 A. It was around May.

13 Q. May of 2022?

14 A. '22, yes.

15 Q. Okay. How long did you stay there?

16 A. No, I was there just for one day.

17 Q. How did you get there?

18 A. I have a cousin there, that she was
19 already there. She had already put money in CFX, and
20 that's how I got to there. And people that were
21 there would ask me sometimes to come over there to
22 give them some kind of training, motivational
23 training or whatever, and I would go.

24 Q. How often did you visit the Louisiana
25 operation?

1 A. Maybe up until now I was going one day a
2 month up until the last.

3 Q. And how did you get there, did you fly,
4 did you drive?

5 A. No, I would go with my car.

6 Q. Okay. Did you -- did you charge CFX for
7 your gas?

8 A. No, I didn't have any extra benefit.

9 Q. And did you ever spend the night?

10 A. Yes.

11 Q. And where would you stay?

12 THE INTERPRETER: I'm sorry, interpreter
13 needs the last part.

14 Q. (BY MR. GULDE) And where would you stay?

15 A. I would stay -- I would stay at a hotel.
16 I would rent a room.

17 Q. What hotel?

18 A. Over there in Kenner, which name is
19 Ramada, and I would stay there.

20 Q. This is the Ramada in Kenner, Louisiana?

21 A. Yes.

22 Q. And would your stays at the Ramada in
23 Kenner, Louisiana coincide with CFX events also held
24 at the Ramada in Kenner?

25 A. Yes, they used to have meetings over

1 there.

2 Q. And did you speak to people who were
3 prospective investors of CFX?

4 A. Especially with people that were already
5 in.

6 Q. My question was: Did you speak with
7 people who were prospective investors in CFX?

8 A. I imagine that there were people there,
9 but I didn't know them; but yes, there was always
10 people there.

11 Q. Including people who had not yet invested
12 in CFX?

13 A. Possibly, yes.

14 Q. How long would you speak?

15 A. 30 minutes, 20.

16 Q. Can you give us an example of the things
17 you would say?

18 A. The information that the academy provided
19 to us: That it was a project where they would --
20 they were investing in forex and crypto currency.

21 Q. And did you have any personal knowledge
22 that there were actual investments in forex or crypto
23 currency?

24 A. No, not really. We supposed so, because
25 they were announcing the classes and all of that. I

1 was talking in general terms about what the academy
2 was doing.

3 Q. And did you tell people how well the
4 investments were going for people?

5 A. No. Actually, in those settings, there
6 would be people that were already in, and they would
7 give their own testimony also.

8 Q. Did you introduce those people who gave
9 their own testimony?

10 A. No. What we would do is something like
11 we would say, "Is there somebody here that is already
12 in the academy, how long have you been there, can you
13 tell us about your experience?"

14 Q. And did anyone ever stand up and say, "My
15 experience has been terrible, I have lost all my
16 money"?

17 A. No.

18 Q. It was always good news, right?

19 A. Yes.

20 Q. But you're somebody who had a good
21 testimony about your personal experience at CFX, at
22 least up until this point?

23 A. Yes.

24 Q. Did you not share that with anyone at
25 these groups?

1 A. No, on -- that would be only if somebody
2 would come and personally ask me, then I would say,
3 "Well, this is my experience."

4 Q. Who's in charge of the Kenner CFX
5 operation?

6 A. I think over there, the strong leader
7 there is Saul.

8 Q. Last name?

9 A. Varela.

10 Q. Spell, please.

11 A. V, as in Victor, A-R-E-L-A.

12 Q. Do you have a phone number for Saul
13 Varela?

14 A. Yes.

15 Q. Is Saul the one who would invite you to
16 Kenner?

17 A. No.

18 Q. Who invited you?

19 A. No, I went because of my cousin.

20 504-704-7788.

21 Q. Do you know if the CFX folks in Kenner
22 would collect cash there in Louisiana?

23 A. I suppose so, but I would not deal with
24 that area, but I assume so, because it is the same
25 system.

1 Q. You never personally saw cash change
2 hands in Louisiana?

3 A. No. Because when I would go to the --
4 the meetings, I would go through what I was going to
5 be doing at the meetings; and then since I didn't
6 know a lot of people, I would immediately leave.

7 Q. Would you roll more big picture
8 information to give to people and fewer details, like
9 contracts?

10 A. Exactly.

11 Q. Who else would you consider being in
12 charge of the Kenner office other than Saul?

13 A. Well, there were people that would be
14 working over there with him, but I do not know who
15 they were. It's like Carmen who works with here --
16 who works with me here, and over there, I don't know.

17 Q. Have you been in touch with Saul since
18 October 4th?

19 A. He called me -- I do not have a big
20 friendship with him, but he have called me like a
21 couple of times.

22 Q. And what did you discuss?

23 A. Just to tell me that he's worried
24 about -- that he's worried with what is going on.

25 Q. Did Saul discuss anything about trying to

1 keep CFX or a related entity going?

2 A. No, not with me.

3 Q. Are you aware of anyone trying to keep
4 the CFX operation going in Louisiana?

5 A. No.

6 Q. Have you visited any other CFX operations
7 around the country?

8 A. In Sherman. Sherman, Texas.

9 Q. Who is in charge of the Sherman, Texas
10 CFX operation?

11 A. There was never an office over there.
12 There was a person that was already in the academy.
13 This person knew about me and asked me to come over
14 and give him a little bit of information --

15 THE INTERPRETER: Interpreter needs to
16 clarify something with the witness.

17 (Interpreter and witness confer)

18 A. -- and give her some information.

19 Q. (BY MR. GULDE) What was her name?

20 A. Yadira Diaz.

21 Q. Spell, please.

22 A. Y-A-D-I-R-A, Yadira, and Diaz, D-I-A-Z.

23 Q. When you came to visit Sherman, were
24 there more people present, in addition to Ms. Diaz?

25 A. Yes, about four people.

1 you with the IRS?

2 A. Yes, them.

3 Q. Okay. And what is the name of the law
4 firm?

5 A. Community Tax.

6 Q. So that is a law firm?

7 A. That's what I understand, yes.

8 Q. And the issues that you had with the IRS,
9 they were related to your 2019 taxes?

10 A. 2019 to the date.

11 Q. Okay. Did you file taxes for 2020?

12 A. No, because that -- that's why they are
13 doing those resolutions, because I have had these
14 conflicts with them.

15 Q. Okay. My question's a little bit
16 different. Do you file taxes for 2020?

17 A. No, no. And that's why I hired them
18 because I want to get current with all of them.

19 Q. Okay. So am I correct to say that you
20 did not file your taxes for 2021?

21 A. No. They are preparing them and they are
22 negotiating with them.

23 Q. When did you hire the Community Tax
24 company?

25 A. Two weeks ago I talked to them. I have

1 talked to them before but then we got the pandemic,
2 yes.

3 Q. Do you have a -- do you have a phone
4 number for them or an address?

5 A. Yes. 1-800-742-8039.

6 Q. Do you know approximately what your
7 income was in 2019?

8 A. It was around 90.

9 Q. And by "90," you mean 90,000 a year?

10 A. Uh-huh.

11 Q. And what was your income approximately in
12 2020?

13 A. It was 99.

14 Q. And you mean 99,000?

15 A. Yes.

16 Q. And what was your income in 2021?

17 A. 167.

18 Q. That 167, you almost doubled your income
19 in 2021. Is that because of the profits that you
20 received from CFX?

21 A. No.

22 Q. What caused this increase of your income
23 in 2021?

24 A. Because in 2020, we didn't sell a lot
25 because we were closed because of the pandemic, and

1 2021, I started to work.

2 Q. But in 2019, you did work, correct?

3 A. Yes.

4 Q. And in 2019, you testified your income
5 was 90,000 a year.

6 A. Approximately, yes.

7 Q. Right. So how was 2021 different from
8 your -- from 2019 in terms of your sales at Aqua
9 Remach?

10 A. Because I recruited sellers. And so
11 because I am a manager, whenever they sell, I also
12 collect benefits.

13 Q. And do you know -- I mean, it is almost
14 the end of the year. Do you know approximately what
15 your income is going to be this year or had been?

16 A. No, I don't really, because CFX had told
17 me that they were going to give me the tax form to
18 know how much I was going -- how much I had won with
19 them, but now since they are closed -- but it should
20 have been around 50 to 60 through CFX; and in the
21 other job, I have the slowdown, but in total, it's
22 going to be over 100.

23 Q. Okay. Let me ask you -- and I'm going to
24 come back to that. Did CFX give you a form for your
25 taxes for 2020?

1 A. No. Because I started in October of
2 2020, and I did not collect money until January of
3 2021.

4 Q. Has CFX ever given you a Form W-9 or any
5 other type of form related to your earnings through
6 CFX?

7 A. No, because it was up until this year
8 that I started to really get involved in January, as
9 I said, so I was waiting for that this year.

10 Q. Have you ever requested a tax form from
11 CFX?

12 A. No. Because they told me that they would
13 not deliver until the end of the year.

14 Q. And how much do you estimate your
15 earnings from CFX for 2021?

16 A. It was a contract for \$4,000 that I had
17 with them that I was collecting \$1,800 every quarter.
18 One year was 7,200 of earnings because that contract
19 was open for a year and a half.

20 Q. You mentioned earlier that your -- did
21 you say your earnings -- you estimate your earnings
22 in total from CFX to be around 100,000?

23 A. I said that along with CFX and the
24 selling of the water systems, I'm going to go over
25 100.

1 Q. Okay. So in total, how much have you
2 made in CFX, how much money have you made?

3 A. About 60,000.

4 Q. And that 60,000 includes commissions and
5 returns from your \$4,000 investment?

6 A. Yes.

7 Q. Do you consider yourself a leader for
8 CFX?

9 A. Well, CFX never paid me to be a leader.
10 I am a natural born leader anywhere I go.

11 Q. That's wonderful. It is great to meet a
12 born leader like yourself, but -- I'm joking.

13 We hear the term "leader" from many
14 investors. Can you tell me what that means related
15 to CFX?

16 A. In CFX, anybody that would refer
17 somebody, they would say, "I am your leader."

18 Q. Okay. So there is nothing special about
19 being a leader at CFX?

20 A. No. Everybody's a leader.

21 Q. Everybody's a leader but Mauricio is a
22 leader of the leaders?

23 A. Yes.

24 Q. Okay. You don't have to answer that.

25 (Exhibit 26 marked)

1 Q. (BY MS. THEMELI) I am going to hand you
2 a document that we have marked Exhibit 26. This is a
3 document that comes from the records of CFX Academy.

4 A. Okay.

5 Q. Do you see that CFX Academy, LLC there on
6 the left corner on top?

7 A. Yes.

8 Q. Okay. And then below that CFX Academy,
9 LLC there it says "Bono Elite." Can you -- what is
10 that?

11 A. That's what we were talking about, that
12 extra monthly bonus.

13 Q. Okay. I see on this document -- and it's
14 very similar -- there is a little diagram here and
15 it's similar to the drawing that you made earlier
16 with the legs up like -- and the three legs for --
17 for each person. Is that -- is that -- is this
18 the -- the same idea that you were trying to describe
19 earlier?

20 A. Yes.

21 Q. Now, here we have -- on this document, we
22 have director uno -- or director one, two, three, and
23 then director four and five, and it says
24 "optional" or "optional."

25 Do you see that?

1 A. Yes.

2 Q. Earlier you only described the three
3 legs. Were there cases where there were more than
4 four direct referrals?

5 A. Yes, you can have several. Three was the
6 minimum you needed.

7 Q. And the more -- the more legs you would
8 have, the more direct referrals you would have, the
9 higher the percentage -- the return would be,
10 correct?

11 A. Depending if they would invite me.

12 Q. You can put that aside. I will go
13 through this very, very quickly, look at another
14 couple of documents here.

15 (Exhibit 27 marked)

16 MR. GULDE: 27.

17 Q. (BY MS. THEMELI) Mr. Turcios, this is
18 Exhibit 27, and this is a report that also comes from
19 the records of CFX or CryptoFX. Do you see the date
20 there, June 1st, 2022?

21 A. Yes.

22 Q. Have you seen a document like this from
23 CFX?

24 A. No, this is the first time.

25 Q. And you mentioned Norma earlier. Was she

1 the only person who did the books at CFX or the
2 accounting at CFX?

3 A. As far as I knew, yes.

4 Q. Okay. If you go to June 7th, you'll see
5 a record for June 7th. Do you see that, sir?

6 A. Yes.

7 Q. In the box on the left, it says
8 "Revenue." Okay. Do you see where it says "Contract
9 REC. Orlin Turcios 677,500"?

10 A. Yes.

11 Q. Do you know what that number represents?

12 A. That had to do with the amount that you
13 were bringing to the academy.

14 Q. So on June 7th, 2022, you brought to the
15 academy 677,500 in cash?

16 A. No. What I think this says, because I'm
17 looking here, I think this is what they did to close
18 the month. So they would do a calculation of all the
19 money you have brought during the month.

20 Q. Okay. And for what month would that be?

21 A. For the day that I'm seeing this, because
22 this is new for me because I didn't know this, but
23 since it says here "6/7," it could have been the
24 month of May. It could be that they are closing the
25 month, because they usually do that in the early days

1 of the following month.

2 Q. So does that sound to you like a typical
3 amount of money that you would collect during the
4 month?

5 A. Yes.

6 Q. And then do you see the box there that
7 says "Cash report"?

8 A. Uh-huh.

9 Q. And do you see your name there where it
10 says "Payment REC. Orlin Turcios \$473,196"?

11 A. Yes.

12 Q. What do you think that means?

13 A. That is related with the other, with the
14 former.

15 Q. And how is it related?

16 A. It could be that because we were
17 delivering it in two days, the system is keeping up
18 what you have been bringing up until this date.

19 Q. Okay. I'm not -- I'm not understanding.

20 Are you saying that the -- the
21 information provided in the revenue box is the same
22 as the information provided in the cash report but
23 the only difference are the dates or --

24 A. The amount. Because this is money that I
25 brought there.

1 Q. Which one is money that you brought?

2 A. I mean, both amounts -- I don't
3 understand because this is new, but in -- based on
4 what I am seeing here, I think this is the amount
5 calculated up until this day of what I have taken
6 there.

7 Q. And you're referring to the "CASH REPORT"
8 box?

9 A. Yes.

10 Q. Okay. So by that date you have
11 brought -- for the previous months, it is your
12 understanding, at least with this of this chart here
13 or this document, that in May of 2022, you brought
14 \$473,196 to CFX in cash?

15 A. Yes, this amount reflects what I brought
16 to them. What I do not know, if one is included in
17 the other.

18 Q. And I'm sorry if this was answered
19 earlier, but typically how much money would you
20 collect every month from investors in 2022?

21 A. When I started to get involved in the
22 beginning, you would have to go there to do the
23 contract, I would not do them myself.

24 Q. Uh-huh.

25 A. I started doing this in March, I believe.

1 Q. And typically how much money -- between
2 March and September of 2022, how much money -- how
3 much cash did you collect on behalf of CFX -- CFX
4 every --

5 A. There were months that could be -- I
6 mean, in the beginning, because then it started
7 growing, maybe 400; and then it went to 600 and it
8 kept growing like that.

9 Q. Other than the Blalock location and Aqua
10 Remach location, were there any other locations in
11 Houston that were collecting money for -- on behalf
12 of CFX?

13 A. I do not know personally. I did it, but
14 I don't know.

15 Q. Do you know Horacio Morales?

16 A. No.

17 Q. Sandra Iglacias (ph)?

18 A. I don't know her either.

19 Q. Juan Gomez?

20 A. I've seen him but I do not have a
21 relationship with him.

22 Q. Salvador Reyes?

23 A. The same thing, I have seen him but we
24 are not -- I mean, lately we have seen each other and
25 probably talked a couple of times.

1 Q. Where have you seen Salvador Reyes?

2 A. At the academy.

3 Q. And what was his role at the academy?

4 A. I understand that he had people under him
5 doing the same thing that I was doing, but I don't
6 have more information.

7 Q. Do you know if he had -- was operating
8 out of an office or house or what do you recognize --

9 A. I don't have that information honestly.

10 Q. Do you know Maribel Coleman?

11 A. No.

12 Q. Oligalio (ph) Munoz?

13 A. Yes, I know him because he worked inside
14 the office.

15 Q. And what was his position -- and by
16 "inside the office," do you mean at Blalock?

17 A. Yes.

18 Q. What was his role at the Blalock office?

19 A. When people would come, many times he
20 would answer. I think he felt like a customer
21 service.

22 Q. Do you know any other employees at the
23 Blalock office?

24 A. Maybe by seeing them but not the names.

25 Q. When you went there to deliver the cash,

1 who did you talk to typically?

2 A. Usually it was Norma or Nancy.

3 Q. How old is Norma approximately?

4 A. I don't know. It is a -- maybe, maybe
5 around my age.

6 Q. Okay. What about Nancy?

7 A. She's a bit younger, younger than I.

8 Q. Was -- did CFX use any -- actually, let
9 me give you a document and maybe you can explain it
10 to me.

11 (Exhibit 28 marked)

12 Q. (BY MS. THEMELI) Mr. Turcios, that's --
13 that's a document that comes from the CFX records,
14 and it is Exhibit 28. It is called "CFX Workflow."

15 Do you see that?

16 A. Yes, I'm looking at it.

17 Q. If we start from -- from the left, do you
18 see this little drawing there that looks like a
19 computer?

20 A. Yes.

21 Q. Okay. And then below that, there is
22 another drawing and -- I'm sorry, below that computer
23 drawing it says "Web2Lead."

24 Do you see that?

25 A. Yes.

1 STATE OF TEXAS

2 COUNTY OF HARRIS

3
4 REPORTER'S CERTIFICATE

5 ORAL VIDEOTAPED DEPOSITION OF

6 MR. ORLIN W. TURCIOS-CASTRO

7 December 8, 2022

8
9 I, Michelle Hartman, the undersigned
10 Certified Shorthand Reporter in and for the State of
11 Texas and Registered Professional Reporter, certify
12 that the facts stated in the foregoing pages are true
13 and correct.

14 I further certify that I am neither
15 attorney or counsel for, related to, nor employed by
16 any parties to the action in which this testimony is
17 taken and, further, that I am not a relative or
18 employee of any counsel employed by the parties
19 hereto or financially interested in the action.
20
21
22
23
24
25

1 SUBSCRIBED AND SWORN TO under my hand and
2 seal of office on this 13th day of December, 2022.

3
4 *Michelle Hartman*
5



6 Michelle Hartman, CSR, RPR

7 Texas CSR 7093

8 Expiration: 12/31/23
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